

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2007

Date Filed: February 29, 2008

Cyber Operations, Inc.

Form 499 Filer ID: Filer ID Pending

Name of Signatory: Mary Stewart Nelson

Title of Signatory: Secretary

I, Mary Stewart Nelson, certify that I am an officer of Cyber Operations, Inc. ("Cyber Operations"), and acting as an agent of Cyber Operations, that I have personal knowledge that Cyber Operations has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification as Exhibit A is an accompanying statement explaining how Cyber Operations' procedures ensure that it is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Signed /s/ Mary Stewart Nelson [electronic signature]

EXHIBIT A

Statement in Support of Certification

1. During 2007, Cyber Operations has not used or disclosed CPNI for any sales or marketing related purposes or activities.
2. Cyber Operations does not use CPNI for any purpose for which customer approval is required.
3. Cyber Operations has nonetheless established a supervisory review process regarding approval of CPNI use for sales and marketing purposes, should such use be contemplated, which includes the establishment, prior to such use, of *inter alia*, a CPNI customer approval and notification process.
4. Cyber Operations has issued a directive to all employees with access to CPNI (the "CPNI Directive") specifying that it is Cyber Operations' policy not to use CPNI for sales or marketing-related activities. The directive addresses the Commission's requirements regarding customer approval for marketing uses of CPNI and prohibits any marketing-related use or disclosures of CPNI. The CPNI Directive also puts employees on notice of disciplinary actions for violations of the directive, which may include termination of employment.
5. Cyber Operations has not used CPNI for any sales or marketing campaigns in 2007.
6. Cyber Operations has not disclosed or permitted access to CPNI to third parties for sales or marketing-related purposes.
7. Cyber Operations does not provide customers with telephone or online access to CPNI at this time, but has established a procedure for implementing authentication procedures should such access be contemplated.
8. Cyber Operations has not taken any actions against data brokers in the past year.
9. Cyber Operations did not receive any customer complaints in 2007 concerning the unauthorized use, release or disclosure of CPNI.
10. Unless otherwise noted, all statements herein cover operations during 2007.